

MATTHEW
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MATTHEW ANDERSON
Date: 2021.01.08
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AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Western District of Oklahoma

FILED

United States of America

v.

Leslie Gomez

Case No. M-21- 009-STE

12:16 pm, Jan 08, 2021
CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA
By: Andrea Caster, Deputy Clerk

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 7, 2021 in the county of Oklahoma in the
Western District of Oklahoma, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. § 841(a)(1)

Possession of methamphetamine with intent to distribute

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent, Quintin R. Cooper, Drug Enforcement Agency, (DEA), which is incorporated and made a part hereof by reference.

☒ Continued on the attached sheet.
Complainant's signature
Special Agent, Quintin Cooper (DEA)
Printed name and title

Sworn to before me and signed in my presence.

Date: Jan 8, 2021

Lawton, OK

City and state:

Judge's signature

SHON T. ERWIN, U.S. MAGISTRATE JUDGE

Printed name and title

**WESTERN DISTRICT OF OKLAHOMA
OKLAHOMA CITY, OKLAHOMA**

STATE OF OKLAHOMA)

COUNTY OF OKLAHOMA)

AFFIDAVIT

I, Quintin R. Cooper, being duly sworn, depose and state as follows:

1. I am a Special Agent (SA) of the Drug Enforcement Administration (DEA), United States Department of Justice. As a SA, I am "an investigative or law enforcement officer of the United States" within the meaning of Title 21, United States Code, Section 878, that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, the offenses enumerated in 21 U.S.C. § 878.

2. I have been employed by the DEA since March of 2019. After successfully completing the DEA Basic Agent Academy in Quantico, Virginia, I was assigned to the DEA Oklahoma City District Office. I have received formal training in the detection and recognition of criminal activity, including narcotic and gang related offenses. I have also been involved in numerous narcotic investigations on the state and federal level which have resulted in apprehension of persons on narcotic and narcotic related charges during my career in law enforcement.

3. During my employment in law enforcement, I have received training and conducted investigations related to illicit drugs and the distribution of illicit drugs in violation of Title 21, United States Code, Sections 841(a)(1), 843(b), 846, and others. I have participated in many aspects of drug investigations including the following:

undercover operations; surveillance; search warrants; arrests; reviewing taped conversations and drug records, along with debriefing defendants, informants, and witnesses who had personal knowledge regarding major narcotics trafficking organizations.

4. I have had conversations with and been in the company of other experienced local, state and federal law enforcement officers as well as prosecuting attorneys representing both state and federal systems concerning narcotics and dangerous drug trafficking activities and criminal violations. I also worked in the company of other experienced law enforcement officers and have discussed their investigative techniques and experiences with them. In the course of investigations, which I have been party to, I have become familiar with the clandestine business practices of drug traffickers and illicit drug traffickers.

5. This affidavit is submitted in support of a criminal complaint charging **Leslie GOMEZ** (DOB: XX-XX-2001) with a violation of Title 21, United States Code, Section 841(a)(1). I am familiar with the facts and circumstances of the investigation involving **GOMEZ** as a result of my personal participation in the investigation and information summarized in reports I have reviewed. I have compiled information derived from numerous discussions with experienced law enforcement officers, including Special Agents of the DEA and other federal, state and local law enforcement officers.

6. Based on the following facts, I believe that probable exists to show that **GOMEZ** possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of Methamphetamine, a Schedule II controlled substance,

in violation of 21 U.S.C. § 841(a)(1). The facts contained in this affidavit are offered to establish probable cause, and do not represent every fact known to myself or other participating agents.

FACTS AND CIRCUMSTANCES


7. On January 7, 2021, Oklahoma City Police Department officers arrived at 2516 SW 31 Street, Oklahoma City, Oklahoma in reference to an active robbery warrant for a subject living at this residence. While waiting for the subject to arrive at the residence, officers observed a vehicle pull into the driveway of the residence. Officers were able to identify the front passenger of the vehicle as the subject with the active robbery warrant. The driver of the vehicle, later identified as **GOMEZ** also had an active robbery warrant. **GOMEZ** and the other passenger of the vehicle were both placed under arrest.

8. **GOMEZ** denied that there was anything illegal inside her vehicle. **GOMEZ** consented to the officers' search of her vehicle, where they located a plastic bag with two plastic containers containing approximately 5.5 pounds (or approximately 2.5 kilograms) of methamphetamine on the passenger side floorboard. The methamphetamine was later field tested and tested positive for the presence of methamphetamine. During a post-*Miranda* interview, **GOMEZ** admitted the 5.5 pounds of methamphetamine belonged to her.

9. Based on my training and experience, 5.5 pounds of methamphetamine vastly exceeds any personal use amount of methamphetamine and is consistent with trafficking weight. As a result, I believe that **GOMEZ** intended to distribute the methamphetamine.

CONCLUSION

10. Based on the facts set forth in this affidavit and my training and experience, I believe there is probable cause to believe that **GOMEZ** possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, in violation of 21 U.S.C. § 841(a)(1).


QUINTIN R. COOPER
Special Agent
Drug Enforcement Administration

Sworn and subscribed before me this 8th day of January 2021.


SHON T. ERWIN
United States Magistrate Judge